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Department of Police
Detroit, Michigan 48226

May 22, 1993

Coleman A. Young, Mayor
City of Detroit

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street N.W. Room 222
Washington, DC 20554

Dear Ms. Searcy:

Subject: PR DOCKET NO. 92-235

Dear Ms. Searcy,

The Detroit Police Department has concerns regarding the FCC Refarming Proposal, specifically, PR Docket 92-235.

The Detroit Police Communications System Section is responsible for radio communications used by all city departments. This includes all Public Safety Units. Any refarming will affect our Police, Fire Department and Emergency Medical Service units.

The police patrol units are located in the 421-512 Mhz range consisting of six (6) radio dispatch channels and eight (8) patrol support channels. In police service we have more than two thousand (2000) mobile and portable radios. The Fire and EMS services utilize the 150-174 Mhz range with approximately five hundred (500) radio units.

While the goal of refarming frequencies is commendable; the Detroit Police Department has three opinions concerning the plan:

1. The time table for implementation.
2. The sharing of frequency bands.
3. Support for the Land Mobile Communications Council Consensus Plan.

The first objection is the implementation period proposed for the year 2004. This ten year period would require a minimum purchase of 250 radios per year just to have complete replacements by the cutoff date now proposed. Public Safety entities work under limited budgets which are developed one year in advance. In effect we have already lost one or possibly two budget years at this proposed period of time.

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The City of Detroit objects to any sharing of frequency space with Non Public Safety users just because new frequencies would be created. The critical nature of Public Safety Communications requires that non Public Safety Users are not allowed to share in the Public Safety bands. Any new frequencies that would be realized through refarming should be permitted to be retained exclusively by Public Safety Agencies. It has been mandated in the past that Public Safety Communication is of the highest priority, in order to assure safety of life and property, and it should remain that way.

The City of Detroit is in agreement with the Consensus plan developed by the Land Mobile Communication Council. It appears the FCC did not give enough consideration to all the users when it suggested new rules. In reality, the users and manufacturers know the real radio world and are best suited to recommend technical methods in the restructuring of the FCC rules concerning land mobile radio.

Sincerely,



K.D. Bullock
Lieutenant
Commanding Officer
Communications Systems Section
Detroit Police Department

KDB:rr